

DWR,

Weld-On® proudly leads the US irrigation market in solvent cement joining solutions; just as proud we have made CA our home for 60 years, and no other solvent cement manufacturer is as aware and supportive of water conservation measures as we are.

However, some of the proposed changes to MWELO are very concerning to us, as they will (i) not achieve the desired effect, (ii) divert attention from real solutions and (iii) have a very significantly negative economic effect on our industry.

By limiting precipitation rates to 1.0 inch per hour, the MWELO limits the abilities of designers and installers to use innovative irrigation technologies to minimize water use. Limiting precipitation rates will have unintended impact on the efficiency of irrigation systems and some water efficient products currently available will be eliminated from use. DWR's goal of prohibiting any runoff and overspray in the landscape is a concept we support, but we believe that this goal can be met without setting a limit on precipitation rate. Limiting precipitation rates will have no effect on overspray or runoff if the system is not designed and installed correctly. We support the IA's recommendation of using the precipitation rate to develop the correct run time for proper irrigation scheduling and management.

The proposed changes to increase irrigation efficiency and a decrease in the ET adjustment factor are concerning. Irrigation efficiency is based on **distribution uniformity**, there is no combination of irrigation products available today that will achieve the requirements proposed in the draft ordinance. This also results in an unattainable ET adjustment factor. Weld-On believes that irrigation efficiency is a crucial component to water conservation, however the levels stated in the proposed draft are unrealistic. We support the IA's recommendation that the irrigation efficiency requirement be 0.75 as recommended by the American Society of Irrigation Consultants and the ET adjustment factor should stay at current levels. Changing an ETAF for new landscape installations will not have an immediate effect on water savings. We believe there are better options to achieve water savings through irrigation water measurement, enforcement of ETAF levels in the current ordinance and a much closer look at many water-wasting mechanical jointing solutions currently employed .

We look forward to working with all parties to develop sustainable solutions to maximize water efficiency in CA.

Thanks,

John Matuska
VP US Sales & Marketing